

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

VIRGINIA BUCKLAND

VS.

OHIO NATIONAL LIFE ASSURANCE CORPORATION

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CIVIL ACTION NO.  
4:15-cv-00400-O

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to FRCP 26(a)(1), Plaintiff **VIRGINIA BUCKLAND** makes initial disclosures as follows:

A. **Identity of persons with knowledge of discoverable information**

<b><u>Title</u></b>	<b><u>Name</u></b>	<b><u>Knowledge Of</u></b>
<b>Plaintiff:</b>	<b>VIRGINIA BUCKLAND</b>	Application, Policy, Claim, Damages; Facts in underlying cause of action
<b>Plaintiff's Attorney:</b>	<b>Mark S. Humphreys</b>  MARK S. HUMPHREYS, P.C. 702 Dalworth Street, Grand Prairie, TX 75050 Office: 972-263-3722 / Fax: 972-237-1690	Attorney fees including thru all appeal levels
<b>Defendant:</b>	<b>OHIO NATIONAL LIFE ASSURANCE CORPORATION</b>	Application, claim, etc.
<b>Defendant's Attorney:</b>	<b>Jill B. Davenport</b> FIGARI & DAVENPORT, LLP 901 Main Street, Ste 3400, Dallas, TX 75202 Office: 214-939-2000 / Fax: 214-939-2090	Case
<b>Witnesses:</b>	<b>Mark Buckland</b>  <b>Mark Buckland, Jr.</b> <b>Sarah Buckland</b> <b>Hanna Buckland</b> <b>1525 Burleson Retta Rd., Burleson, TX</b>	Application, Policy, Claim, Damages; Facts in underlying cause of action

	<b>Al Fox III</b>	Executor / Brother of Deceased
<b>Selling Policy Agent:</b>	<b>Charles Mercier</b> 506 Georgia Avenue, Suite 206 North Augusta, South Carolina 29841	Application, Policy, records requested by Defendant, etc.
<b>Custodian of Records of:</b>	<b>Wells Fargo Bank, N.A.</b> c/o CSC, 211 E. 7 <sup>TH</sup> Street, Suite 620 Austin, TX 78701-3218	Records requested by Defendant
	<b>UNT Health</b> 855 Montgomery Street, Fort Worth, TX 76107	
	<b>Mark Sanders, D.O.</b> 3437 West 7 <sup>TH</sup> Street, Fort Worth, TX 76107	
	<b>Examination Management Services, Inc.</b> c/o Brian Vidrik, 3050 Regent Blvd., Suite 400, Irving, TX 75063	
	<b>Pecan Village Mobile Home Park</b> c/o David Zulejkic, 330 N. Broadway Joshua, TX	
	<b>ExamOne, A Quest Diagnostic Company</b> 10101 Renner Blvd., Lenexa, KS 66219	
	<b>John Hancock Life Insurance Company</b> c/o CSC, 211 E. 7 <sup>TH</sup> Street, Suite 620 Austin, TX 78701-3218	
	<b>Athene Annuity and Life Company</b> c/o C.T. Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201	
	<b>Blue Cross and Blue Shield of Texas, A Division of Health Care Service Corporation</b> c/o Legal Division, 1001 East Lookout drive, Richardson, TX 75082	
	<b>Texas Pulmonary Care #817-461-0201</b> 911 Medical CR Drive, Arlington, TX 76012	

B. **DOCUMENTS**

1. Denial Letter
2. Claim file as it relates to Plaintiff
3. Policy
4. Policy application
5. Documentation obtained by Custodian of Records of **Charles Mercier**
6. Documentation obtained by Custodian of Records of **Wells Fargo Bank, N.A.**
7. Documentation obtained by Custodian of Records of **UNT Health**
8. Documentation obtained by Custodian of Records of **Mark Sanders, D.O.**
9. Documentation obtained by Custodian of Records of **Examination Management Services, Inc.**
10. Documentation obtained by Custodian of Records of **Pecan Village Mobile Home Park**
11. Documentation obtained by Custodian of Records of **ExamOne, A Quest Diagnostic Company**
12. Documentation obtained by Custodian of Records of **John Hancock Life Insurance Company**
13. Documentation obtained by Custodian of Records of **Athene Annuity and Life Company**
14. Documentation obtained by Custodian of Records of **Blue Cross and Blue Shield of Texas, A Division of Health Care Service Corporation**
15. Documentation obtained by Custodian of Records of **Texas Pulmonary Care**

C. **COMPUTATION OF DAMAGES**

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| 1) Actual damages for policy benefits  | \$1,000,000.00 |
| 2) Doubling of damages due to the intentional nature of Defendant's conduct in this matter | \$2,000,000.00 |
| 3) Mental anguish damages resulting from Defendant's intentional conduct in this matter    | \$ 50,000.00   |

- 4) Penalty at 18% per annum on actual damages from November 23, 2014, \$ ???  
until paid
- 5) Attorneys fees at \$350.00 per hour, plus all fees thru any and all appeals
- 6) Court Costs

D. **INSURANCE POLICIES**

None other than the subject policies of Defendant.

Signed on June 10, 2015.

Respectfully Submitted

/s/ Mark S. Humphreys

BY: Mark S. Humphreys - SBN 00789762

**MARK S. HUMPHREYS, P.C.**

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**Attorney for Plaintiff**

**CERTIFICATE OF SERVICE** On June 10, 2015, the undersigned hereby certifies that an electronically transmitted copy of this document was sent to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing was sent to all known defense counsel.

/s/ Mark S. Humphreys

Attorney for Plaintiff